

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 kkalkowski@kcnvlaw.com

7 *Attorneys for Defendant*
Las Vegas Metropolitan Police Department

8
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 GO BEST, LLC, a Nevada limited-liability
company,

12 Plaintiff,

13 vs.

14 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; and OFFICERS DOE I-X,

15 Defendants.
16

Case No.: 2:24-cv-00632-RFB-DJA

**STIPULATION TO EXTEND
DISCOVERY
(First Request)
[ECF No. 17]**

17 IT IS HEREBY STIPULATED AND AGREED between the parties that the discovery
18 cut-off date of January 21, 2025, be continued for a period of sixty (60) days up to and including
19 **March 24, 2025**, for the purpose of allowing the Court to make a decision on the Motion for
20 Protective Order filed by Plaintiff, [ECF No. 19], and, following that decision, allowing the
21 parties to complete written discovery and conduct depositions.

22 **I. DISCOVERY COMPLETED TO DATE**

23 The parties have exchanged their Initial Rule 26 Disclosures. Defendant LVMPD also
24 provided a supplemental disclosure. On October 24, 2024 LVMPD served Interrogatories and

Request for Production of Documents on Plaintiff. Following an extension, Plaintiff provided objections on December 9, 2024. On December 17, 2024, Plaintiff filed a Motion for Protective Order, [ECF No. 19], asking the Court to limit the scope of discovery.

II. DISCOVERY YET TO BE COMPLETED

LVMPD believes that Plaintiff has not adequately responded to the Interrogatories and Requests for Production of Documents. Following a decision by the Court on the pending Motion for Protective Order, Plaintiff may need to supplement responses to discovery and/or LVMPD may need to serve additional written discovery. The parties will likely need to take depositions regardless of the Court's ruling on the Motion for Protective Order, though the Court's ruling will necessarily have a major impact on the scope of depositions.

III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

As stated above, the parties have a current dispute concerning discovery that could not be resolved in a meet-and-confer effort. Plaintiff filed a Motion for Protective Order, which this Court set for a hearing on February 4, 2025, [ECF No. 20]. That hearing date is after the current deadline for the parties to complete discovery. LVMPD will be filing a timely response to the Motion. Because of the present discovery dispute, the parties have not been able to progress with further discovery until the dispute is resolved by this Court. For that reason, the parties request a brief extension of the current unexpired discovery deadlines.

IV. PROPOSED EXTENDED DEADLINES

The parties respectfully request this Court enter an order as follows:

Deadline	Current Date	Proposed New Date
Discovery Cut Off	January 21, 2025	March 24, 2025
Disclosure of Experts	November 21, 2024	No extension requested

Deadline	Current Date	Proposed New Date
Disclosure of Rebuttal Experts	December 23, 2024	No extension requested
Dispositive Motion Deadline:	February 19, 2025	April 21, 2025
Pre-Trial Order	March 21, 2025	May 20, 2025

(A) Motions in Limine/*Daubert* Motions.

Under LR 16-3(b), any motions in limine, including *Daubert* motions, shall be filed and served 30 days prior to the commencement of Trial. Oppositions shall be filed and served 14 days thereafter. Reply briefs will be allowed only with leave of the Court.

(B) Pretrial Order.

Pursuant to LR 26(1)(e)(5), the Joint Pretrial Order shall be filed with this Court no later than thirty days after the date set for filing dispositive motions, unless dispositive motions are filed, in which case the date for filing the Joint Pretrial Order shall be suspended until 30 days after the decision on the dispositive motions or further order of this Court. The disclosures required by FRCP 26(a)(3) and any objections shall be included in the final pretrial order.

(C) Extensions or Modification of the Discovery Plan and Scheduling Order.

In accordance with LR 26-3, applications to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR 6-1, be supported by a showing of good cause for the extension. All motions or stipulations to extend a deadline set forth in a discovery plan shall be received by the Court not later than 21 days before the expiration of the subject deadline. A request made after the expiration of the subject deadline shall not be granted unless the movant demonstrates that the failure to set was the result of excusable neglect. Any motion or stipulation to extend a deadline or to reopen discovery shall include:

- 1 (a) A statement specifying the discovery completed;
- 2 (b) A specific description of the discovery that remains to be completed;
- 3 (c) The reasons why the deadline was not satisfied or the remaining discovery was
- 4 not completed within the time limits set by the discovery plan; and
- 5 (d) A proposed schedule for completing all discovery.

6 The parties submit that good cause exists for an extension of the unexpired discovery

7 deadlines. The parties seek some additional time so that this Court can resolve a current dispute

8 and then the parties will have time to complete the necessary discovery based upon this Court's

9 ruling. This request is timely. This brief delay will not impede this matter. No trial has been set

10 and dispositive motions have not yet been filed.

11 DATED this 31st day of December, 2024.

12 KAEMPFER CROWELL

ASHCRAFT & BARR LLP

13 By: /s/ Lyssa S. Anderson

14 LYSSA S. ANDERSON

15 Nevada Bar No. 5781

16 KRISTOPHER KALKOWSKI

17 Nevada Bar No. 14892

18 1980 Festival Plaza Drive

19 Suite 650

20 Las Vegas, Nevada 89135

Attorneys for Defendant,
Las Vegas Metropolitan Police
Department

By: /s/ Jeffrey Barr

JEFFREY F. BARR

Nevada Bar No. 7269

ALICIA R. ASHCRAFT

Nevada Bar No. 6890

8275 South Eastern Avenue,

Suite 200-695

Las Vegas, NV 89123

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 2nd day of January 2025.


UNITED STATES MAGISTRATE JUDGE